

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION  
CASE NO. 4:25-cv-5415-JD

Wild Geese Consultants, LLC; and  
Purpose - SC, Inc.,

Plaintiffs,

v.

Broadstep Behavioral Health, Inc.;  
Excalibur Youth Services, LLC; Bain  
Capital Double Impact, LP; and Jason  
Upham,

Defendants.

**DECLARATION OF  
MATTHEW HUGHES**

Matthew Hughes hereby submits this declaration in support of Broadstep Defendants' Motion to Recognize Certain Requests for Admission as being deemed admitted.

1. On June 23, 2025, my office served discovery requests on both plaintiffs.
2. These discovery requests included requests for admission.
3. Neither plaintiff served responses to these requests for admission by July 29, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Matthew A. Hughes

July 30, 2025  
Date